

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

LAWRENCE E. PENN, III,  
ALTURA ST. MICHAEL EWERS,  
CAMELOT ACQUISITIONS SECONDARY  
OPPORTUNITIES MANAGEMENT, LLC,  
THE CAMELOT GROUP INTERNATIONAL, LLC,  
and  
SSECURION LLC,

Defendants,

-and-

A BIGHOUSE FILM AND PHOTOGRAPHY  
STUDIO LLC,

Relief Defendant.

Case No.: 1:14-cv-0581-VEC

ECF Case

**NOTICE OF MOTION OF CAMELOT ACQUISITIONS SECONDARY  
OPPORTUNITIES MANAGEMENT, LLC AND THE CAMELOT GROUP  
INTERNATIONAL, LLC TO VACATE, ALTER, OR AMEND THE JUDGMENT  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 60(B)**

PLEASE TAKE NOTICE that, upon the annexed memorandum of law and the declaration of John T. Dixon, and upon all prior proceedings in this action, Defendants Camelot Acquisitions Secondary Opportunities Management, LLC and The Camelot Group International, LLC hereby move this Court before the Honorable Valerie E. Caproni, United States District Judge, to vacate, alter, or amend the judgment pursuant to Federal Rule of Civil Procedure 60(b).

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's order of August 25, 2020, Dkt. No. 369, all papers submitted in opposition to this motion shall be filed with the Court and served on all parties on or before September 25, 2020.

Dated: September 11, 2020  
New York, New York

Respectfully submitted,

PERKINS COIE LLP

/s/ Keith W. Miller

Keith W. Miller

John T. Dixon

PERKINS COIE LLP

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*Attorneys for Defendants Camelot Acquisitions  
Secondary Opportunities Management, LLC and  
The Camelot Group International, LLC*